

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARTINE DEROM,)
)
Plaintiff,)
)
v.) No. 23-cv-3505
)
PETER REDEL,) Judge:
)
Defendant.) Magistrate:

COMPLAINT

Now comes the Plaintiff, MARTINE DEROM, by and through her attorneys, THOMAS H. MURPHY and COGAN & POWER, P.C., and in support of this Complaint against Defendant, PETER REDEL, states as follows:

COUNT I
(Negligence)

1. Plaintiff, MARTINE DEROM, is an Illinois citizen and Defendant, PETER REDEL, is a Wisconsin citizen.
2. The controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. Section 1332, making subject matter jurisdiction appropriate in this court based on diversity of citizenship.
3. MARTINE DEROM was injured on October 8, 2022, in a vehicular collision that day driving westbound on CTH C/Spring Street approaching 55th Drive in Union Grove, Wisconsin.
4. At the time of the crash, Defendant, PETER REDEL, was driving northbound on 55th Drive approaching CTH C/Spring Street.

5. The collision was caused when Defendant, PETER REDEL, failed to stop at the posted stop sign for northbound traffic on 55th Drive at the intersection of 55th Street and CTH C/Spring Street.

6. It was the duty of the Defendant, PETER REDEL, to exercise reasonable care under the circumstances to protect the safety of MARTINE DEROM and others on or near the roads on which PETER REDEL was operating his vehicle.

7. In violation of this duty, PETER REDEL was negligent in one or more of the following acts or omissions:

- (a) Driving at an excessive speed;
- (b) Failing to comply with traffic signs and/or signals; and
- (c) Failed to keep a proper lookout.

8. As a direct and proximate result of one or more of the aforementioned negligent acts or omissions, MARTINE DEROM sustained serious pecuniary and personal injuries, including a fractured vertebrae, fractured collar bone, fractured wrist, and fractured ankle. She has sustained, and will in the future sustain, damages including pain and suffering, emotional pain and suffering, emotional distress, and medical expenses. Many of these losses are permanent.

9. This Count claims all compensable damages allowed by law against Defendant, PETER REDEL, as a result of Plaintiff MARTINE DEROM's personal injuries.

WHEREFORE, it is respectfully requested that judgment be entered in favor of the Plaintiff, MARTINE DEROM, and against the Defendant, PETER REDEL, for all damages allowed by law.

PLAINTIFF DEMANDS TRIAL BY JURY.

/s/Thomas H. Murphy
One of the Attorneys for Plaintiff

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